## BEFORE THE DIVISION OF MEDICAL QUALITY BOARD OF MEDICAL QUALITY ASSURANCE DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA

In the Matter of the Accusation Against:	) )
PAUL H. YOUNG, M.D. Certificate No. G-50294	) No. D-4108 ) ) )
Respondent.	) )
<u>DECISI</u>	NO
The attached Stipulation	n is hereby adopted by the
Division of Medical Quality of the	e Board of Medical Quality
Assurance as its Decision in the above-entitled matter.	
This Decision shall become February 15, 1990	ome effective on
IT IS SO ORDEREDFel	oruary 15, 1990

DIVISION OF MEDICAL QUALITY BOARD OF MEDICAL QUALITY ASSURANCE

THERESA CLAASSEN Secretary/Treasurer

1	JOHN K. VAN DE KAMP, Attorney General
2	of the State of California JANA L. TUTON
3	Deputy Attorney General 1515 K Street, Suite 511
4	P. O. Box 944255 Sacramento, California 94244-2550
5	Telephone: (916) 324-5342
6	Attorneys for Complainant
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9	BEFORE THE DIVISION OF MEDICAL QUALITY
10	BOARD OF MEDICAL QUALITY ASSURANCE DEPARTMENT OF CONSUMER AFFAIRS
11	STATE OF CALIFORNIA
12	In the Matter of the Accusation ) No. D-4108
13	Against: ) PAUL YOUNG ) STIPULATION
14	PAUL YOUNG ) <u>STIPULATION</u> 545 Florence ) Webster Grove, MO 63119 )
15	Physician's and Surgeon's
16.	Certificate No. G50294
17	Respondent. )
18	
19	Respondent Paul Young, M.D. through his counsel Barry
20	Vogel, and the Board of Medical Quality Assurance, Division of
21	Medical Quality, through its counsel Deputy Attorney General Jana
22	L. Tuton, do hereby enter into the following stipulation:
23	1. Respondent Paul Young, M.D. hereby acknowledges
24	receipt of Accusation No. D-4108, Statement to Respondent, and
25	copies of the Notice of Defense form.
26	2. Respondent has retained Barry Vogel to be his

27 attorney in Case No. D-4108 and has consulted with Mr. Vogel

concerning the charges and allegations contained in Accusation No. D-4108 and the effect of this stipulation.

- 3. Respondent is fully aware of his right to a hearing on the charges and allegations contained in Accusation No. D-4108, his right to reconsideration, appeal, and any and all rights which may be accorded pursuant to the California Administrative Procedure Act and the laws of the State of California.
- 4. Respondent hereby freely and voluntarily waives his right to a hearing, reconsideration, appeal and any and all other rights which may be accorded by the California Administrative Procedure Act and the laws of the State of California with regard to Accusation No. 4108, except as set forth below.
- 5. Respondent presently practices medicine in the State of Missouri and has practiced there since 1985.
- 6. Respondent's California certificate No. G50294 is presently in cancelled status due to nonpayment of fees.

Based upon the foregoing recital of facts, the Division of Medical Quality and respondent stipulate as follows:

- A. Respondent shall not exercise his right to automatically renew his license No. G50294.
- B. Respondent shall not apply for licensure in California until at least five (5) years from the effective date of this stipulation. Any such application will be made as a new applicant and the Board may consider all the facts and circumstances of the charges in Accusation No. D-4108 in determining whether to issue a license to respondent. In the

1	event licensure is denied, respondent shall be entitled to
2	contest all allegations and facts upon which denial is based as
3	provided by California law, including Business and Professions
4	Code section 485.
5	C. The Division shall withdraw Accusation No. D-4108
6	without prejudice.
7	It is agreed that the terms set forth herein shall be
8	null and void and not binding upon the parties hereto unless
9	approved by the Board of Medical Quality Assurance of the State
10	of California.
11	DATED: 2-6-90
12	JOHN K. VAN DE KAMP, Attorney General of the State of California
13	JANA L. TUTON
14	Deputy Attorney General
15	JANA L. TUTON
16	Deputy Attorney General
17	Attorneys for Complainant
18	DATED: 2/-/ac
19	DATED: 2/4/40  DONAHUE AND CALLAHAM
20	DOWARDE AND CARDARAN
21	BARRY VOCEL, ESQ.
22	Attorneys for Respondent
23	Accorneys for Respondenc
24	DATED: 2-1-80
25	DOUL MOUNT WO
26	PAUL YOUNG, M.D.
27	Respondent 03573110- SA89AD0574